

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Ryszard Jedrzejewski,  
  
Petitioner,  
  
v.  
  
Jolanta Anna Jedrzejewski,  
  
Respondent.

FILED: SEPTEMBER 2, 2008  
08CV4988  
JUDGE DOW  
MAGISTRATE JUDGE KEYS  
Case No. EDA \_\_\_\_\_

**VERIFIED PETITION FOR RETURN OF JAKUB JEDRZEJEWSKI  
TO POLAND PURSUANT TO THE HAGUE CONVENTION ON  
CIVIL ASPECTS OF INTERNATIONAL CHILD ABDUCTION**

Petitioner Ryszard Jedrzejewski ("Mr. Jedrzejewski"), by and through his attorneys DLA Piper US LLP, and pursuant to the Convention on the Civil Aspects of International Child Abduction done at the Hague on October 25, 1980 (the "Hague Convention") and implemented by 42 U.S.C. §11603, petitions this Court for an Order directing Respondent Jolanta Anna Jedrzejewski (the "Abducting Parent") to return Jakub Jedrzejewski ("Jakub") to Mr. Jedrzejewski and his habitual residence of Poland. Mr. Jedrzejewski states as follows in support of his Petition:

**Parties**

***Ryszard Jedrzejewski***

1. Mr. Jedrzejewski is a citizen of Poland who resides in Gorlice, Poland.
2. Mr. Jedrzejewski is the natural father of Jakub.
3. Mr. Jedrzejewski has a right of custody of Jakub, within the meaning of the Hague Convention.

***Jolanta Anna Jedrzejewski***

4. The Abducting Parent is a citizen of Poland.

5. On information and belief, the Abducting Parent currently is residing in Chicago, Illinois and remains in the United States as an illegal alien.

***Jakub Jan Jedrzejewski***

6. Jakub is a citizen of Poland and is eight (8) years old.

7. Jakub was born on March 12, 2000 in Gorlice, Poland. (A copy of Jakub's birth certificate is attached as Exhibit 1).

8. Jakub was a habitual resident of Poland until he was wrongfully removed to the United States by the Abducting Parent on or about July 2007.

**Jurisdiction**

9. This Court has jurisdiction under 42 U.S.C. §11603(a).

10. Venue is proper in this District pursuant to 28 U.S.C. §1391(b).

**The Jedrzejewski Family Resided In Poland**

11. On August 28, 1997, Mr. Jedrzejewski married the Abducting Parent.

12. On March 12, 2000, Jakub was born in Poland.

13. Mr. Jedrzejewski and the Abducting Parent remain married and are not divorced.

14. While Jakub lived in Poland, Mr. Jedrzejewski was the caregiver who fed and clothed Jakub and made sure that Jakub attended school.

15. Mr. Jedrzejewski and the Abducting Parent lived together as husband and wife until July 2007 when the Abducting Parent left Poland without notice.

**Mr. Jedrzejewski Was Injured and Briefly Hospitalized in July 2007**

16. On or about July 2007, Mr. Jedrzejewski had an accident in his home and required medical treatment.

17. Mr. Jedrzejewski was hospitalized for a few days to recover from his accident.

18. On July 13, 2007, Mr. Jedrzejewski attempted to call the Abducting Parent at their marital residence but no one answered.

19. On July 14, 2007, Mr. Jedrzejewski again attempted to call the Abducting Parent and checked himself out of the hospital because no one answered the telephone.

20. Mr. Jedrzejewski did not know where the Abducting Parent and Jakub had gone but inquired of family members and others in an attempt to determine where they had gone.

**Wrongful Removal and Retention of Jakub**

21. On July 13, 2007, the Abducting Parent wrongfully removed Jakub from Poland to the United States within the meaning of the Hague Convention and 42 U.S.C. §11603.

22. On information and belief, the Abducting Parent purchased plane tickets which included a return flight to Poland.

23. On information and belief, the Abducting Parent did not return to Poland, as scheduled.

24. On information and belief, the Abducting Parent currently resides with Jakub in Chicago, Illinois.

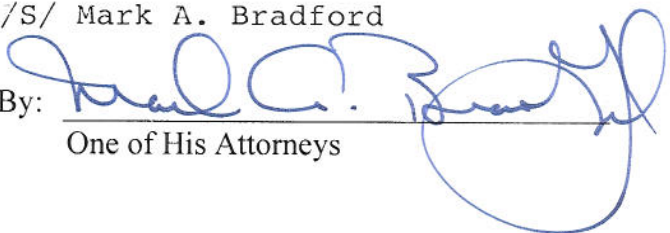
WHEREFORE, for the reasons set forth above, Ryszard Jedrzejewski respectfully requests that this Court Order the return of his child Jakub Jedrzejewski to Poland, Jakub's place of habitual residence, award to Ryszard Jedrzejewski all costs and fees incurred in this

proceeding, as permitted by 42 U.S.C. §11607, and grant such other relief as the Court determines necessary and proper.

RYSZARD JEDRZEJEWSKI

/S/ Mark A. Bradford

By:


  
One of His Attorneys

Michael O'Neil (ARDC No. 6201736)  
Mark A. Bradford (ARDC No. 6282564)  
DLA PIPER US LLP  
203 N. LaSalle Street  
Chicago, IL 60601  
(312) 368-4000

Dated: September 2, 2008

**VERIFICATION**

I verify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

  
\_\_\_\_\_  
Ryszard Jedrzejewski

JUDGE DOW

MAGISTRATE JUDGE KEYS

EDA

EXHIBIT 1



The national emblem of the Republic of Poland.-----

The Republic of Poland. -----

Malopolska province-----

Registry Office of Gorlice. Number: 282/2000 Place: Gorlice. Date: 17 March 2000----

## **CERTIFIED FULL COPY OF A BIRTH ENTRY-----**

**I. PARTICULARS OF THE CHILD.** 1.Surname: JĘDRZEJEWSKI 2. First name and middle name: JAKUB JAN 3. Sex: male. 4. Date of birth: the twelfth day of March two thousand (12.03.2000.) 11:25 a.m. 5. Place of birth: GORLICE---

## **II. PARTICULARS OF PARENTS.**

**Father.** 1. Surname: JĘDRZEJEWSKI 2. First name: RYSZARD 3. Family name: JĘDRZEJEWSKI 4. Date of birth: 23 July 1947 5. Place of birth: Gorlice 6. Residence at the time of child's birth: Gorlice-----

**Mother.** 1. Surname: JĘDRZEJEWSKA 2. First name and middle name: JOLANTA ANNA 3. Family name: MORDARSKA 4. Date of birth: 16 June 1965 5. Place of birth: Grybów. 6. Residence at the time of child's birth: Gorlice -----

**III.PARTICULARS OF INFORMANT.**1. Full name: Jędrzejewski Ryszard 2. Place of residence: Gorlice, ul. Mickiewicza 28. -----

## **IV.NOTES. -----**

Signature of informant:/-/ Jędrzejewski Ryszard. Deputy Superintendent Registrar: /-/ Leokadia Pawłowska

## **Additional notes.-----**

This is to certify that this is a true copy of the birth entry. Place of issue: Gorlice. Date of issue: 09 April 2008. Witnessed by Superintendent Registrar. [stamp:] Deputy Superintendent Registrar Leokadia Pawłowska [signature]-----

A round official seal bearing the national emblem of the Republic of Poland reading: Registry Office of Gorlice---

Stamp duty of PLN33-----

XX

I hereby certify that this is a true and exact translation of the original document produced to me. I attach my official seal and sign my name this 19<sup>th</sup> day of April 2008. Index. No. 167/08



*B. Cyganczuk*  
Sworn Translator  
Barbara Cyganczuk